Codes already have been examined in various public proceedings. See, e.g., Public Notice, Ad Audit, Inc. Requests FCC Approval of System, for Verification of Broadcasts of Programs or Commercials, Mimeo No. 5304, released June 21, 1985 (addressing proposals by both Ad Audit, Inc. and Telescan, Inc.). **Indeed, Airtrax itself successfully argued on that basis against having its own proposed use of line 22 made subject to public comment procedures.** See letter dated October 22, 1986 from John G. Johnson, Jr., Esq. Counsel to Airtrax, to Charles G. Schott, FCC Policy and Rules Division. It would be fundamentally unfair and inappropriate, in addition to being unnecessary and contrary to the interests of the broadcast industry and the public, to require Nielsen to delay the offering of its AMOL service on line 22 when it has already had its system and proposal reviewed by the public and when Airtrax was not itself subject to similar procedures.[19/]

For the foregoing reasons, Nielsen respectfully requests to the Commission to reject the claims made in Airtrax's Opposition,

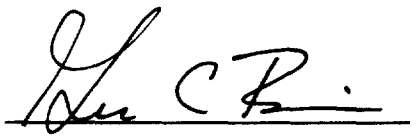
---

[19/]For the reasons noted in note 2, supra, the Commission similarly should not assume that public comment is necessary based upon the letters Airtrax caused to have been filed with the Commission, especially when those letters were filed based upon a misunderstanding of Nielsen's proposal caused by Airtrax.

and grant Nielsen's Request for Permissive Authority as soon as possible.

Respectfully submitted,

A.C. Nielsen Company

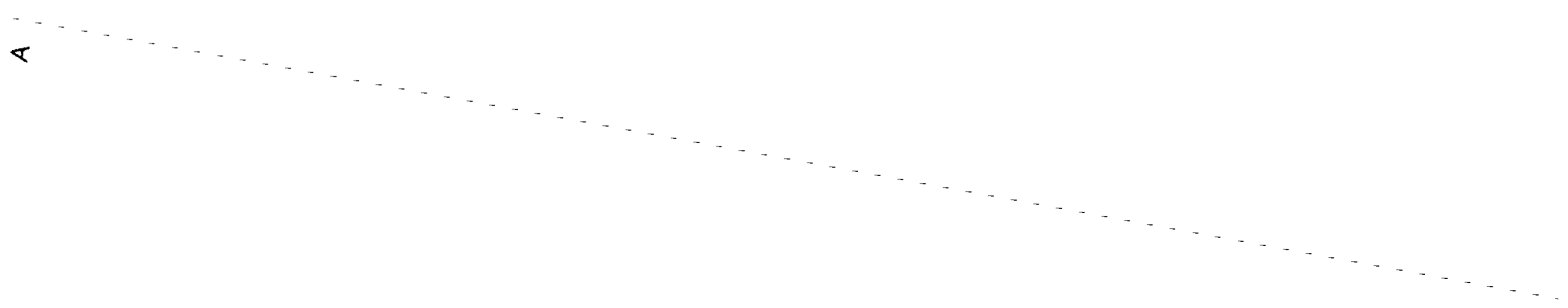
By: 

Grier C. Raclin

Heron, Burchette, Ruckert & Rothwell
1025 Thomas Jefferson St., N.W.
Washington, D.C.
(202) 337-7700

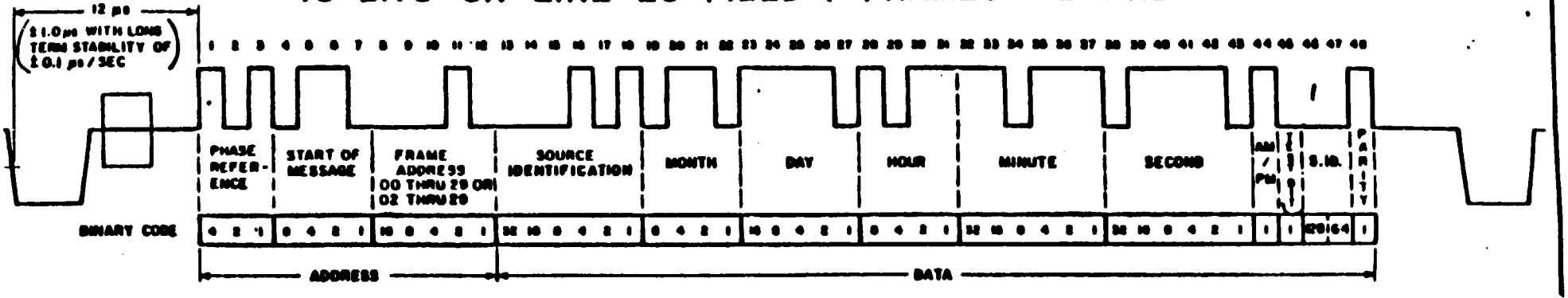
Its Attorneys

Dated: August 21, 1989


A

AM(SOURCE IDENTI. .CATIO' SIGNAL FORMAT . IGURE 1'

48 BITS ON LINE 20 FIELD 1 FRAMES 02 AND 03



TYPICAL WAVEFORM SHOWN IS FOR LINE 20 FIELD 1 FRAMES 02 AND 03
AND IS CODED STARTING AT BIT 0: FRAME 02, ABC SOURCE IDENTIFICATION 05, 6TH MONTH, 30TH DAY, 11TH HOUR, 55TH MINUTE, 30TH SECOND, PM, EASTERN DAYLIGHT TIME. BIT 48 INDICATES ODD PARITY DURING THIS TRANSMISSION.

FRAME ADDRESS

S 1 THROUGH 12 AND 48 APPEAR ON ALL FRAMES. BITS 13 THROUGH 47 V CONTAIN DIFFERENT INFORMATION ON DIFFERENT FRAMES AS SHOWN BELOW.

AME	ASSIGNMENT
	NOT ASSIGNED - SEE NOTE 10
	NOT ASSIGNED - SEE NOTE 10
	SID CALENDAR AND TIME
	SID CALENDAR AND TIME
-29	NOT ASSIGNED

SOURCE IDENTIFICATION ASSIGNMENT

00 -15	ABC
16 -31	CBS
32 -47	NBC
48 -63	PBS
64 -79	ABC
80 -96	CBS
96 - 111	NBC
112 -127	PBS
128 -143	NOT ASSIGNED
144-159	" "
160-175	" "
176-191	" "
192-207	" "
208-223	" "
224-239	" "
240-255	NOT ASSIGNED

NOTES

1. SEND ON LINE 20 FIELD 1 ONLY.
2. RISE TIME 220 ns ± 50 ns. OVERSHOOT, UNDERSHOOT AND SPURIOUS SIGNALS LESS THAN 5 IRE UNITS.
3. BIT INTERVALS ARE ± 0.1 µs, N.A.D. WITH CUMULATIVE ERROR OVER 48 BITS PER LINE NOT TO EXCEED 0.5 µs.
4. DATA IS IN BINARY CODE.
5. "1" = 80 IRE UNITS −0 +10 IRE UNITS.
6. "0" = 0 IRE UNITS −0 +10 IRE UNITS.
7. AM = 0, PM = 1
8. BIT 48 IS AVAILABLE FOR FORCING A CHANGE LINE IN DECODER MEMORY FOR SYSTEM TEST.
9. VIDEO NOT TO SCALE.
10. FRAME ADDRESSES 00 AND 01 ARE OMITTED IN CERTAIN SECONDS PER DROP FRAME TIME CODE. DELETING THESE FRAME NUMBERS ADJUSTS THE FRAME COUNT SO THAT FRAME COUNT TIME WILL TRACK REAL TIME SECONDS.
11. WHEN PRESENT, FRAME ADDRESS 00 IDENTIFIES THE FIRST EVEN FRAME NUMBER. WHEN FRAME ADDRESS 00 IS OMITTED, 02 IS THE FIRST EVEN FRAME ADDRESS.
12. THE DATA IN ADJACENT FRAMES 02 AND 03 ARE IDENTICAL. DATA CHANGES MAY OCCUR FOLLOWING FRAME 03 AND BEFORE THE NEXT FRAME 02.
13. BIT 48 WILL BE A PARITY BIT AND BE EQUAL TO A ONE WHEN THE SUM OF BITS 1 THRU 47 ARE EVEN FOR THAT TRANSMISSION. (ODD PARITY)

11-82

B

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

JUL 18 1985

IN REPLY REFER TO:

Mr. Burton Greenberg
TeleScan, Inc.
36 East 12th Street
New York, New York 10003

Dear Mr. Greenberg:

This responds to the request submitted by TeleScan, Inc., on May 7, 1985, for FCC approval of a system to encode advertiser identification signals on line 22 of the television active video signal.

As described by TeleScan, this system would be used to provide independent verification of broadcasts of advertising messages. In operation, data signals carrying an advertiser's ISCI identification number would be encoded on commercials broadcast by a television station. The television station's signal would be monitored by equipment capable of decoding the data and recording it, along with the date, time of day, length of commercial, and presence of audio and video. TeleScan then would use the recorded information to provide various reports for its advertiser clients.

TeleScan indicates that it would prefer to transmit its signals on line 20 of the vertical blanking interval (VBI), but it has met resistance from broadcasters who are reserving this resource for their own purposes. It, therefore, desires to test and possibly implement the TeleScan system on line 22.

The Mass Media Bureau requested comments on the TeleScan request in a Public Notice released June 10, 1985. Comments were submitted by parties representing broadcasting and advertising interests. The commenting parties representing broadcasting interests express some concerns and reservations with respect to use of the TeleScan system, but in general are not opposed to its authorization. In particular, broadcasters argue that they should be informed of the presence of TeleScan signals and that the ultimate control and authority with respect to transmission of these signals should rest with the individual television station licensees. Broadcasters also are concerned that the TeleScan system is relatively untested and might cause interference or degradation to picture quality on some receivers, particularly new units that they claim do not employ overscanning. The CBS and ABC television networks oppose authorization of the TeleScan system. They submit that the presence of data signals on line 22 will cause unacceptable interference to picture

B

quality and that the monitoring of commercial announcements can be performed by other means that will not impair the video service. Commenting parties representing advertising interests support the authorization and use of a system for electronically monitoring broadcasts of commercial messages.

Upon examination of TeleScan's request, we believe that the TeleScan data qualifies as a "special signal," that is, a signal related to broadcast operation, but not intended for public use. The Commission set forth its policy concerning special signals in a Public Notice dated April 20, 1970. See, 22 FCC 2d 779 (1970). The Commission recognized the benefits of such signals and noted that they contribute to efficient broadcast operation. However, the Commission was also concerned that the use of special signals could cause some degradation of the broadcast program signal. Therefore, under the authority of Section 303(c) of the Communications Act, which directs the Commission to regulate the "kind of apparatus to be used with respect to ". . . the purity and sharpness of emissions from stations . . . ," the Commission held that such signals cannot be employed without its specific authorization. The Commission also specified that such permission will be granted only where it is infeasible to transmit the signals by means which have no detrimental effect on the broadcast service.

We find that the TeleScan system meets the standards established for special signals. TeleScan data, while not intended for use by the viewing public, is clearly related to the program material within which it is transmitted and to the operation of a television station's primary program service. The verification of broadcast of advertising messages is an element of the business side of broadcasting and is, therefore, a part of broadcast operation. In this regard, we find the TeleScan system the same as other special signals such as the cue and control tones used in program presentation. In addition, the nature and purpose of the information to be encoded requires that it be transmitted as an integral part of its associated program material. Thus, we believe it would not be practical to transmit TeleScan commercial verification data separately from the television signal carrying the program being monitored.

Our evaluation of the technical description of the TeleScan system indicates that the method used to encode the data and the presence of these signals on line 22 generally would not cause noticeable or objectionable interference or degradation to a station's video program service. It appears that use of the TeleScan system would not require changes to any component of a station's program presentation or transmitter equipment. We also find this system to be compatible with the technical standards for the television service such that its use would not necessitate modifications to our television technical rules.

On the basis of the above, we believe that the TeleScan system is consistent with our policy concerning use of special signals. Moreover, it appears that the use of this system for commercial verification would provide a number of benefits and efficiencies for the industry. We, therefore, have decided to

authorize transmission of TeleScan signals on line 22 of the television picture for the purpose of verification of broadcasts of commercial announcements. We wish to emphasize that this is a permissive authority only. Television licensees retain ultimate control over their transmissions and are not required to transmit TeleScan signals. It would therefore be permissible for a broadcaster to blank the TeleScan data line or replace it with reconstructed video. Consequently, we would expect that the broadcaster would be notified of the presence of advertiser verification signals on line 22 in commercial announcements. The authority to transmit TeleScan signals on line 22 also remains subject to the condition that the signals not produce unacceptable degradation of the television service received by viewers.

Accordingly, pursuant to Section 303(e) of the Communications Act, authority IS GRANTED for general use of the TeleScan system on line 22 by licensees in the television services. This authority is limited to use of the TeleScan system for purposes of verification as discussed herein. No other broadcast uses of the TeleScan system are permitted without the express consent of the Commission. Authority for this action is provided under Section 0.283 of the Commission's rules.

Sincerely,

James C. McKinney

James C. McKinney
Chief, Mass Media Bureau

JUL 18 1985

Mr. Erwin G. Krasnow
Verner, Liipfert, Bernhard, McPherson
and Hand, Chartered
1660 L Street, N.W.
Suite 1000
Washington, DC 20036

Dear Mr. Krasnow:

This responds to the request submitted by Ad Audit Inc., on June 12, 1985, for FCC approval of a system to encode advertiser and program identification signals on-line 22 of the television active video signal.

As described by Ad Audit, this system would be used to provide independent verification of broadcasts of programs and commercial messages. In operation, data signals carrying program identification information would be encoded on commercial announcements and programs broadcast by a television station. The television station's signal would be monitored by equipment capable of decoding the data and recording it, along with the date, time of day, length of commercial, and presence of audio, video, and color. Ad Audit then would use the recorded information to provide various reports for its clients.

Ad Audit indicates that it would prefer to transmit its signals on the vertical blanking interval (VBI). However, Ad Audit recognizes that television stations use the VbI for other purposes and is concerned that stations might delete its data if it were encoded on this portion of the television signal. In order to ensure that its signals are transmitted, Ad Audit seeks to encode the identification data on line 22 of the active video signal.

The Mass Media Bureau requested comments on the Ad Audit request in a Public Notice released June 21, 1985. Comments were submitted by parties representing broadcasting and advertising interests. The commenting parties representing broadcasting interests express some concerns and reservations with respect to use of the Ad Audit system, but in general are not opposed to its authorization. In particular, broadcasters argue that they should be

informed of the presence of Ad Audit signals and that the ultimate control and authority with respect to transmission of these signals should rest with the individual television station licensees. Broadcasters also are concerned that the Ad Audit system is relatively untested and might cause interference or degradation to picture quality on some receivers, particularly new units that they claim do not employ overscanning. The CBS and ABC television networks oppose authorization of the Ad Audit system. They submit that the presence of data signals on line 22 will cause unacceptable interference to picture quality and that the monitoring of commerical announcements can be performed by other means that will not impair the video service. Commenting parties representing advertising interests support the authorization and use of a system for electronically monitoring broadcasts of commercial messages.

Upon examination of Ad Audit's request, we believe that the Ad Audit data qualifies as a "special signal," that is, a signal related to broadcast operation, but not intended for public use. The Commission set forth its policy concerning special signals in a Public Notice dated April 20, 1970. See, 22 FCC 2d 779 (1970). The Commission recognized the benefits of such signals and noted that they contribute to efficient broadcast operation. However, the Commission was also concerned that the use of special signals could cause some degradation of the broadcast program signal. Therefore, under the authority of Section 303(e) of the Communications Act, which directs the Commission to regulate the "kind of apparatus to be used with respect to ". . . the purity and sharpness of emissions from stations . . . ," the Commission held that such signals cannot be employed without its specific authorization. The Commission also specified that such permission will be granted only where it is infeasible to transmit the signals by means which have no detrimental effect on the broadcast service.

We find that the Ad Audit system meets the standards established for special signals. Ad Audit data, while not intended for use by the viewing public, is clearly related to the program material within which it is transmitted and to the operation of a television station's primary program service. The verification of broadcast of advertising messages and programs is an element of the business side of broadcasting and is, therefore, a part of broadcast operation. In this regard, we find the Ad Audit system the same as other special signals such as the cue and control tones used in program presentation. In addition, the nature and purpose of the information to be encoded requires that it be transmitted as an integral part of its associated program material. Thus, we believe it would not be practical to transmit Ad Audit verification data separately from the television signal carrying the program being monitored.

Our evaluation of the technical description of the Ad Audit system indicates that the method used to encode the data and the presence of these signals on line 22 generally would not cause noticeable or objectionable interference or degradation to a station's video program service. It appears that use of the Ad Audit system would not require changes to any component of a station's

program presentation or transmitter equipment. We also find this system to be compatible with the technical standards for the television service such that its use would not necessitate modifications to our television technical rules.

On the basis of the above, we believe that the Ad Audit system is consistent with our policy concerning use of special signals. Moreover, it appears that the use of this system for commercial and program verification would provide a number of benefits and efficiencies for the industry. We, therefore, have decided to authorize transmission of Ad Audit signals on line 22 of the television picture for the purpose of verification of broadcasts of programs and commercial announcements. We wish to emphasize that this is a permissive authority only. Television licensees retain ultimate control over their transmissions and are not required to transmit Ad Audit signals. It, therefore, would be permissable for a broadcaster to blank the Ad Audit data line or replace it with reconstructed video. Consequently, we would expect that the broadcaster would be notified of the presence of advertiser verification signals on line 22 in commercial announcements. The authority to transmit Ad Audit signals on line 22 also remains subject to the condition that the signals not produce unacceptable degradation of the television service received by viewers.

Accordingly, pursuant to Section 303(e) of the Communications Act, authority IS GRANTED for general use of the Ad Audit system on line 22 by licensees in the television services. This authority is limited to use of the Ad Audit system for purposes of verification as discussed herein. No other broadcast uses of the Ad Audit system are permitted without the express consent of the Commission. Authority for this action is provided under Section 0.283 of the Commission's rules.

Sincerely,

James C. McKinney

James C. McKinney
Chief, Mass Media Bureau

AStillwell:lg/prd;pab/MMB
Typed: 7/18/85

FEDERAL COMMUNICATIONS COMMISSION

WASHINGTON, D.C. 20554

NOV 6 1986

Mr. John C. Johnson, Jr.
Kadison, Pfaelzer, Woodward, Quinn & Rossi
2000 Pennsylvania Ave., N.W.
Washington, D.C. 20006

IN REPLY REFER TO

Dear Mr. Johnson:

This is in response to your letters of October 22, 1986, and October 31, 1986 regarding a method developed by Republic Properties Inc. (Republic), for encoding advertiser-related and program-indentification information on line 22 of the television active video signal. The information that would be encoded on to line 22 would consist of data identifying commercial advertisements and other program material, including the date and time of day of the advertisements or other material, the length of the presentation and the presence of audio, video and color content in the presentation. You indicate that your client's method is similar to a method previously developed by Ad Audit Inc. and subsequently approved by the Commission. You also indicate that Republic's system operates within the technical confines of the Ad Audit system and therefore request that the Commission similarly approve Republic's proposed system.

Upon examination of your request, we believe that the Republic system signal qualifies as a "special signal," that is, a signal related to broadcast operation, but not intended for public use. The Commission set forth its policy concerning special signals in a Public Notice dated April 20, 1970. See, 22 FCC 2d 779 (1970). The Commission recognized the benefits of such signals and noted that they contribute to efficient broadcast operation. However, the Commission was also concerned that the use of special signals could cause some degradation of the broadcast signal. Therefore, under the authority of Section 303(e) of the Communications Act, which directs the Commission to regulate the "kind of apparatus to be used with respect to. . . the purity and sharpness of emissions from stations. . .," the Commission held that such signals cannot be employed without its specific authorization. The Commission also specified that such permission will be granted only where it is infeasable to transmit the signals by means which have no detrimental effect on the broadcast service.

We find that Republic's system meets the standards established for special signals. Republic's signal, while not intended for use by the viewing public, is clearly related to the program material within which it is transmitted and to the operation of a television station's primary program service. The verification of the broadcast of advertising messages is an element of the business side of broadcasting and is, therefore, a part of broadcast operation. In this regard, we find the Republic system the same as other special signals such as the cue and control tones used in program presentation. In addition, the nature and purpose of the information to be

encoded requires that it be transmitted as an integral part of its associated program material. Thus we believe it would not be practical to transmit commercial verification data separately from the television signal carrying the program being monitored.

Our evaluation of the technical description of the Republic system indicates that the method used to encode the data and the presence of these signals on line 22 generally would not cause noticeable or objectionable interference or degradation to a station's video progam service. It appears that the use of Republic's system would not require changes to any component of a station's program presentation or transmitter equipment. We also find this system to be compatible with the technical standards for the television service such that its use would not necessitate modifications to our television technical rules.

On the basis of the above, we believe that the Republic system is consistant with our policy concerning use of special signals. Moreover, it appears that the use of this system for commercial verification would provide a number of benefits and efficiencies for the industry. We, therefore, have decided to authorize transmission of the Republic system on line 22 of the television picture for the purpose of verification of broadcasts of commercial announcements and other program material. We wish to emphasize that this is a permissive authority only. Television licensees retain ultimate control over their transmissions and are not required to transmit Republic's signals. It would therefore be permissible for a broadcaster to blank the system's signal or replace it with reconstructed video. Consequently, we would expect that the broadcaster would be notified of the presence of advertiser verification signals on line 22 in commercial announcements. The authority to transmit the system's signals on line 22 also remains subject to the condition that the signals not produce unacceptable degradation of the television service received by viewers.

Accordingly, pursuant to Section 303(e) of the Communications Act, authority IS GRANTED for general use of the Republic system on line 22 by licensees in the television services. This authorty is limited to use of the Republic system for the purposes of verification as discussed herein. No other broadcast uses of the Republic system are permitted without the express consent of the Commission. Authority for this action is provided under Section 0.283 of the Commission's rules.

Sincerely,

/s/ James C. McKinney

James C. McKinney
Chief, Mass Media Bureau

SRoberts/sr/pab/PRD/MMB
typed 11/4/86

C

A.C. NIELSEN COMPANY

MEDIA RESEARCH SERVICES GROUP ☐ 375 Patricia Avenue ☐ Dunedin, Florida 33528 ☐ (813) 734-5473

February 27, 1979

RECEIVED MAR 2 1979

MAR 2 1979

POLICY AND RULES
DIVISION

Mr. William J. Tricarico
Secretary
Federal Communications Commission
Washington, D. C. 20054

Dear Sir:

REFERENCE: BC Docket No. 78-308
RM-2869

In the matter of:
Amendment of Section 73.682 of
the Commission's Rules to Permit
the Transmission of Program
Related Signals in the Vertical
Blanking Interval of the
Standard Television Signal

We have studied the replies to this docket, and after checking again with our source for copies of the documents, we did not find our comments among these replies. A phone call to the Policy Division, Broadcast Bureau, determined that we had supplied an insufficient number of copies. Since we feel that the results of our testing are pertinent to the docket and the advantages of monitoring a broadcasted code deserves a complete and careful examination, a copy of our original filing is attached, along with the following amplification of the aforementioned advantages.

1. Monitoring a radiated code will produce more accurate & reliable data.

   Monitoring a broadcasted coded signal is a more accurate means of confirming the program actually broadcast. When the monitoring equipment is placed in the station and fed from a video source containing a code which is subsequently deleted prior to broadcast, the possibility of the monitoring unit being fed with a signal other than the one being transmitted is much greater. For example, several studio-to-transmitter feeds are frequently available so that the station has alternate paths to reduce the probability of loss of video to the transmitter. It is difficult, if not impossible, to monitor the circuit actually feeding the transmitter. Location of the monitoring equipment at the actual transmitter site also presents access and installation difficulties; some stations even maintain backup transmitters and antennas. The complexity, variety, and variability of the routing of video feeds within the station also contribute to the reduction of the reliability of the data when monitored within the station.

Experience from the field tests, mentioned in our first letter of comments, indicate that these difficulties are indeed found when monitoring is done from an internal station feed.

2. The radiated method overcomes the difficulty associated with off-air feeds.

Many stations receive their program feed "off-air," i.e., reception of a broadcast signal from another station. In some cases, these stations receive a feed from one network over AT&T facilities, and another network "off-air." If the code cannot be radiated, the "off-air" feed will not contain any identification of the signal.

3. Credibility of data improved with a radiated system.

If the signal is radiated, any party can monitor the signal by merely receiving and decoding the signal with the appropriate equipment. NBC notes this access feature in their petition. The independence of the party monitoring from the station protects the credibility of the monitored data.

4. Radiation provides no burden on those stations not electing to participate.

Stations will not need to take an active role in the SID system if the radiation of the code is allowed. The code imbedded in the network signal can be allowed to pass through the station's plant without special equipment needed to delete the code, or specific action on the part of the station to assure that the code is deleted. Implementation of the system without allowing radiation of the code will require equipment to be installed in all possible source feeds to delete the code even though the station may not elect to participate in the system.

5. Allowing radiation of the code avoids the additional "in-line" equipment.

As pointed out in the NBC petition, the complication of additional equipment necessary to delete the code is overcome by allowing radiation of the signal. This equipment not only adds to the expense, but adds another piece of equipment directly "in-line" with the video transmission system, obviously adding another critical component which requires maintenance and monitoring.

Furthermore, as mentioned in point 1., above, each possible feedpath to the transmitter requires a unit to delete the code. Where a station maintains a backup transmitter, a second piece of equipment must be provided, under the best of conditions. Under the worst conditions, multiple feeds, to multiple transmitters would have to be maintained as well as equipped.

6. Clarification of AMST reference to the 1200 "black box" system.

   Use of the SID system, as proposed by the NBC petition, focuses on the determination of network program carriage by local stations. Our use of the system proposed in the NBC petition centers around a complete and independent measurement of network program carriage by stations, i.e., nothing to do with the 1200 "black box" system.

Therefore, in light of these arguments and the findings from our field tests, we feel that NBC's petitioned changes to the Rules will be in the best interests of all parties involved.

Very truly yours,

A. C. NIELSEN COMPANY

W. S. Hamill
Executive Vice President

WSH:mt
Attachment

CERTIFICATE OF SERVICE

I, Arlene F. Lacki, a secretary in the law firm of Heron, Burchette, Ruckert & Rothwell, do hereby certify that I have on this 21st day of August, 1989, caused copies of the foregoing REPLY TO OPPOSITION to be hand-delivered to the following:

*John C. Johnson, Jr.
Bryan, Cave, McPheeters & McRoberts
1015 Fifteenth Street, N. W.
Suite 1000
Washington, D.C. 20005=2689

*The Honorable Alfred Sikes
Chairman
Federal Communications Commission
1919 M St., N.W.
Room 814
Washington, D.C. 20554

*The Honorable James H. Quello
Member
Federal Communications Commission
1919 M St., N.W.
Room 802
Washington, D.C. 20554

*The Honorable Patricia Diaz Dennis
Member
Federal Communications Commission
1919 M St., N.W.
Room 832
Washington, D.C. 20554

*The Honorable Sherrie Marshall
Member-Designate
Federal Communications Commission
1919 M St., N.W.
Room 844
Washington, D.C. 20554

*The Honorable Andrew Barrett
Member-Designate
Federal Communications Commission
1919 M Street, Northwest
Room 826
Washington, D.C. 20554

*Mr. Alex D. Felker
Chief
Mass Media Bureau
Federal Communications Commission
1919 M Street, Northwest
Room 314
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*Roy J. Stewart, Esquire
Chief
Video Services Division
Mass Media Bureau
Federal Communications Commission
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*Stephen F. Sewell, Esquire
Assistant Cheif
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*Clay C. Pendarvis, Esquire
Chief
Television Branch
Video Services Division
Mass Media Bureau
Federal Communications Commission
1919 M Street, Northwest
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*Mr. Gordon Godfrey
Television Branch
Video Services Division
Mass Media Bureau
Federal Communications Commission
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*Bradley P. Holmes, Esquire
Chief
Policy and Rules Division
Mass Media Bureau
Federal Communications Commission
2025 M Street, Northwest
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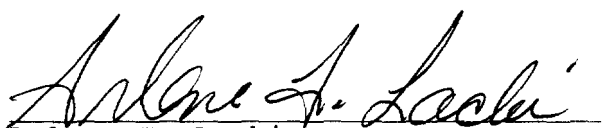
Washington, D.C. 20036

*Mr. James McNally
Chief
Engineering Policy Branch
Policy and Rules Division
Mass Media Bureau
Federal Communications Commission
2025 M Street, Northwest
Room 8112
Washington, D.C. 20036

*Mr. Bernard Gorden
Engineering Policy Branch
Policy and Rules Division
Mass Media Bureau
Federal Communications Commission
2025 M Street, Northwest
Room 8114
Washington, D.C. 20036



Arlene F. Lacki